

1 PHILLIP A. TALBERT
United States Attorney
2 TARA AMIN
Assistant United States Attorney
3 501 I Street, Suite 10-100
4 Sacramento, CA 95814
Telephone: (916) 554-2700
5 Facsimile: (916) 554-2900

6 AMANDA N. LISKAMM
Director
7 RACHAEL L. DOUD
Assistant Director
8 ANDREW K. CRAWFORD
9 FRANCISCO L. UNGER
Trial Attorneys
10 Consumer Protection Branch
Civil Division
11 U.S. Department of Justice
12 450 5th Street, NW
Washington, DC 20530
13 Telephone: (202) 451-7301
14 Email: andrew.k.crawford@usdoj.gov

15 Attorneys for Plaintiff United States of America

16 UNITED STATES DISTRICT COURT

17 EASTERN DISTRICT OF CALIFORNIA

18 UNITED STATES OF AMERICA,

19 Plaintiff,

20 v.

21 CB SURETY, LLC, et al.,

22 Defendants.
23
24
25
26
27

Civil Case No. 2:23-cv-02812-TLN-DB

UNITED STATES' MOTION FOR A
DEFAULT JUDGMENT AND
PERMANENT INJUNCTION AGAINST
DEFENDANTS TRAVIS SMITH,
STEPHEN CHRISTOPHER, BRYAN
BASS, CB SURETY LLC, PEAK BAKERY
LLC, KP TESTING, LLC, MOTION
MEDIA MARKETING INC., SJC
FINANCIAL SERVICES INC., BASS
BUSINESS CONSULTANTS, AND THINK
PROCESSING LLC

Pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure, Plaintiff the United States of America moves the Court to enter a Default Judgment in this matter against Defendants Travis Smith, Stephen Christopher, Bryan Bass, CB Surety LLC, Peak Bakery LLC, KP Testing, LLC, Motion Media Marketing Inc., SJC Financial Services Inc., Bass Business Consultants, and Think Processing LLC for their failure to appear or otherwise respond to the government's Complaint within the time prescribed by Rule 12(a)(1)(A)(i) of the Federal Rules of Civil Procedure.

In support of this request, the United States submits a brief and an affidavit.

Dated: July 25, 2024

Respectfully submitted,

PHILLIP A. TALBERT
United States Attorney

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

TARA AMIN
Assistant United States Attorney

ARUN G. RAO
Deputy Assistant Attorney General

AMANDA N. LISKAMM
Director, Consumer Protection Branch

RACHAEL L. DOUD
Assistant Director, Consumer Protection Branch



ANDREW K. CRAWFORD
FRANCISCO L. UNGER
Trial Attorneys
United States Department of Justice

Attorneys for Plaintiff United States of America

CERTIFICATE OF SERVICE

I certify that on July 25, 2024, a copy of foregoing Motion for a Default Judgment and Permanent Injunction as well as the Notice of Motion for a Default Judgment and Permanent Injunction, the Brief in Support of the United States' Motion for a Default Judgment and Permanent Injunction, Affidavit of Andrew K. Crawford in Support of the United States' Motion for a Default Judgment and Permanent Injunction, and the [Proposed] Order Granting Entry of Default Judgment and Permanent Injunction were served on the parties by the following methods:

First class mail:

Travis Smith
2608 Lakeside Drive
Providence Village, TX 76227

KP Testing, LLC
c/o Registered Agents Inc.
4445 Corporation Lane
Virginia Beach, VA 23462

Stephen Christopher
220 W. Hawthorn St.
San Diego, CA 92101

Motion Media Marketing Inc.
c/o Stephen Christopher
14144 Mazatlan Ct
Poway, CA 92064

CB Surety LLC
c/o Registered Agents Inc.
4030 Wake Forest Rd Ste 349
Raleigh, NC 27609

SJC Financial Services Inc.
c/o Stephen Christopher
13940 Umbria Way
Poway, CA 92064

Peak Bakery LLC
c/o Registered Agents Inc.
4030 Wake Forest Road Ste 349
Raleigh, NC 27609

Think Processing LLC
c/o Cloud Peak Law, LLC
1095 Sugar View Dr, Ste 500
Sheridan, WY 82801

CM/ECF:

Daniel Olmos
Nolan Barton Olmos & Luciano LLP
600 University Avenue
Palo Alto, CA 94301
430 D Street
Davis, CA 95616

Counsel for Defendants Thomas Eide and Cascades Pointe at Clemson, LLC

1 Manny Medrano
2 RIMÓN PC
3 2029 Century Park East
4 Los Angeles, CA 90067

5 *Counsel for Defendants Aric Gastwirth, Reseller Consultants, Inc., and Ambragold, Inc.*

6 Email:

7 Bryan Bass
8 bassbryan1@gmail.com

9 Bass Business Consultants
10 c/o Bryan Bass
11 bassbryan1@gmail.com

12 

13 Andrew K. Crawford
14 Trial Attorney
15 United States Department of Justice

16 *Attorney for Plaintiff United States of America*
17
18
19
20
21
22
23
24
25
26
27